



west virginia department of environmental protection

Environmental Enforcement
601 57th Street SE
Charleston, WV 25304
Telephone: (304) 926-0470 Fax: (304) 926-0488

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

October 26, 2017

Intercontinental Export Import, Inc.
Attn: Saurabh Naik
8815 Center Park Drive, Suite 400
Columbia, MD 21045

CERTIFIED RETURN RECEIPT REQUESTED

Dear Mr. Naik:

Enclosed is Order No. 8779 dated October 26, 2017. This Order is issued to Intercontinental Export Import, Inc. by the director of the Division of Water and Waste Management under the authority of Chapter 22, Article 11, Section 12 of the Code of West Virginia. This Order contains notification of the right of appeal under the provisions of Chapter 22, Article 11, Section 21.


Jeremy W. Bandy
Chief Inspector

cc: Scott G. Mandirola, Director, DWWM (via e-mail)
Yogesh Patel, Asst. Director, DWWM/Permits (via e-mail)
Robin C. Dolly, Assistant Chief Inspector, EE/WW (via e-mail)
David C. Simmons, Assistant Chief Inspector, EE (via e-mail)
Christopher M. Gatens, Enforcement Hearing Officer, EE (via e-mail)
Debora J. Peters, Environmental Resources Specialist, EE (via e-mail)
Laura McGee, Environmental Resources Specialist (via e-mail)
Ryan Harbison, Environmental Inspector Supervisor, EE/WW (via e-mail)
Glennnda Parsons, Environmental Inspector, EE/WW (via e-mail)
Shyrel Moellendick, MSSS, EE (via e-mail)
Lisa Trakis, US EPA, Region III (via e-mail)



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**ORDER
ISSUED UNDER THE
WATER POLLUTION CONTROL ACT
WEST VIRGINIA CODE, CHAPTER 22, ARTICLE 11**

TO: Intercontinental Export Import, Inc.
Attn: Saurabh Naik
8815 Centre Park Drive, Suite 400
Columbia, MD 21045

DATE: October 26, 2017

ORDER NO.: 8779

INTRODUCTION

The following findings are made and Order issued to Intercontinental Export Import, Inc. (hereinafter, "IEI") pursuant to the authority vested in the Director of the Division of Water and Waste Management under Chapter 22, Article 11, Section 1 et seq. of the Code of West Virginia.

FINDINGS OF FACT

In support of this Order, the Director hereby finds the following:

1. IEI operates large warehouses and recycling facilities located in and around Parkersburg, Wood County, West Virginia. The warehouses are known to contain several polymer materials in the form of pellets, flake, strand, beads, plop, dust, granules, and resins. These facilities are at the sites formerly known as Ames True Temper. On July 23, 2014, IEI was reissued WV/NPDES Water Pollution Control Permit No. WV0003204 for its regulated activity at Plant No. One (1). Regulated activity at Plant No. Two (2) is not covered under a WV/NPDES permit.
2. On June 13, 2011, West Virginia Department of Environmental Protection (WVDEP) issued Order No. 7377 to IEI. The Order required that IEI immediately initiate actions necessary for the submission of an administratively complete application for registration under the WV/NPDES General Permit for Storm Water Associated with Industrial Activities at its Plant No. Two (2) facility.

3. On May 28, 2015, IEI entered into Consent Order No. 7802. The Order was issued in response to IEI's following violations at Plant No. One (1):
 - a. Multiple Discharge Monitoring Report (DMR) exceedances
 - b. Failure to properly submit DMRs
 - c. Failure to maintain good housekeeping
 - d. Failure to properly operate/maintain the facility
 - e. Failure to install proper flow measurement devices
 - f. Failure to install outlet markers
 - g. Failure to develop/maintain a Groundwater Protection Plan (GPP) and a Storm Water Pollution Prevention Plan (SWPPP)
 - h. Failure to submit a plan of action and quarterly progress reports for obtaining compliance with the final effluent limitation for phthalate esters, vinyl chloride, and trichloroethylene
 - i. Failure to obtain WV/NPDES coverage for an unpermitted outlet

The Order was also issued in response to IEI's failure to obtain WV/NPDES permit coverage at Plant No. Two (2).

4. On June 9, 2016, WVDEP personnel conducted an inspection and records review of IEI's Plant No. One (1). During the inspection, violations of the following sections of WV State Code and the WV/NPDES permit were observed and documented:
 - a. Section C.01 – IEI failed to practice good housekeeping and maintain properly sealed drums. A large area with poor housekeeping and a leaking drum were observed.
 - b. Appendix A.I.13 – IEI failed to have a permanent outlet marker at Outlet No. 001.
 - c. Appendix A.II.1 – IEI failed to properly operate and maintain stormwater controls to prevent plastic pellets from leaving the site. Plastic pellets were visible in the discharge from Outlet No. 001.
 - d. Section A – IEI failed to meet permit discharge limits.
 - e. 22-11-1 et seq. – IEI failed to comply with the discharge limitations provided for Outlet No. 004 in Consent Order No. 7802.

As a result of the aforementioned violations, Notice of Violation (NOV) Nos. W16-54-063-GMP, W16-54-064-GMP, W16-54-065-GMP, W16-54-066-GMP, and W16-54-067-GMP were issued to IEI.

5. On June 9, 2016, WVDEP personnel conducted an inspection and records review of IEI's Plant No. Two (2). During the inspection, a violation of the following sections of WV State Code and WV Legislative Rules was observed and documented:
 - a. 22-11-1 et seq., 22-11-8(b), and 47CSR10 Section 3.1 – IEI was discharging from a point source into waters of the State without authorization pursuant to a current and valid WV/NPDES permit. IEI failed to comply with the terms and conditions of Order for Compliance Item No. Two (2) of Order No. 7377, by failing to obtain the required WV/NPDES permit.

As a result of the aforementioned violations, NOV No. W16-54-062-GMP was issued to IEI.

6. On February 6, 2017, WVDEP personnel conducted an inspection and records review of IEI's Plant No. One (1). During the inspection, violations of the following sections of WV State Code and the WV/NPDES permit were observed and documented:
 - a. Section C.01 – IEI failed to practice good housekeeping.
 - i. Waste and pellets were still scattered around the site in a few locations, coming into contact with stormwater.
 - ii. A diesel spill and resin type spill from the drums stored on site were not fully remediated. Leaking and deteriorating drums were being stored outside.
 - b. Appendix A.II.1 – IEI failed to properly operate and maintain stormwater controls to prevent plastic pellets from leaving the site.
 - c. Section A – IEI failed to meet permit discharge limits.
 - d. 22-11-1 et seq. – IEI failed to comply with Consent Order No. 7802.
 - i. Order for Compliance Item No. Eight (8) – IEI failed to comply with the Final Order Limitations.
 - ii. Order for Compliance Item No. Four (4) – IEI failed to submit any quarterly progress reports. The missing reports were submitted subsequent to this inspection.
 - iii. Order for Compliance Item No. Five (5) - IEI failed to install flow measurement devices that can measure all wastewater discharged through Outlet Nos. 001 and 004.

As a result of the aforementioned violations, NOV Nos. W17-54-020-GMP, W17-54-021-GMP, and W17-54-022-GMP were issued to IEI.

7. On February 6, 2017, WVDEP personnel conducted an inspection and records review of IEI's Plant No. Two (2). During the inspection, the following violation of WV State Code was observed and documented:
 - a. 22-11-1 et seq., 22-11-8(b), and 47CSR10 Section 3.1 - IEI was discharging from a point source into waters of the State without authorization pursuant to a current and valid WV/NPDES permit.
 - i. IEI failed to comply with the terms and conditions of Order for Compliance Item No. Two (2) of Order No. 7377, by failing to obtain the required WV/NPDES permit. IEI submitted a WV/NPDES permit application for this site, but the receiving stream data was returned to the facility in June 2015 for corrections. Upon subsequent review by WVDEP Permitting Section, it was determined that IEI Plant No. Two (2) would need an individual permit, therefore the previously pending application was terminated. A WV/NPDES permit modification application to add Plant No. Two (2) to the existing WV/NPDES permit for Plant No. One (1) was received by WVDEP personnel. However, the application was not administratively complete, and the modification had not been granted at the time of this inspection.

8. On May 22, 2017, WVDEP personnel conducted a review of IEI Plant No. One (1) facility records from the time period of May 1, 2015 through April 30, 2017. During this review, the following violations of the terms and conditions of IEI's WV/NPDES permit and WV State Code were observed:
- a. Section A.001 - Six (6) exceedances of IEI's permit parameters were observed and documented (Table 1). These exceedances can be further defined as:
 - i. Minor violations-three (3)
 - ii. Moderate violations-three (3)
 - b. 22-11-1 et seq. – Nineteen (19) exceedances of IEI's Consent Order No. 7802 parameters for Outlet No. 004, as described in Order for Compliance Item No. Eight (8), were observed and documented (Table 2). These exceedances can be further defined as:
 - i. Minor violations-eight (8)
 - ii. Moderate violations-nine (9)
 - iii. Major violations-two (2)
 - c. 22-11-1 et seq., Appendix A.III.2, and Section C.06 – IEI failed to submit the April 2017 DMRs within twenty (20) days following the end of the reporting period. In accordance with Order for Compliance Item No. Ten (10) of Order No. 7802, IEI agreed to pay money held in abeyance, in the event that IEI failed to properly submit DMRs.

As a result of the aforementioned violation, NOV No. W17-54-025-GMP was issued to IEI.

9. On July 10, 2017, WVDEP personnel conducted a records review of IEI. During this review, the following violation of the WV/NPDES permit was observed and documented:
- a. 22-11-1 et seq, Appendix A.III.2, and Section C.06 – IEI failed to submit the May 2017 DMRs within twenty (20) days following the end of the reporting period.

As a result of the aforementioned violation, NOV No. W17-54-035-GMP was issued to IEI.

10. On July 26, 2017, WVDEP personnel conducted a records review of IEI. During this review, the following violations of the WV/NPDES permit and WV State Code were observed and documented:
- a. 22-11-1 et seq, Appendix A.III.2, and Section C.06 – IEI failed to submit the June 2017 DMRs within twenty (20) days following the end of the reporting period.
 - b. 22-11-1 et seq. - IEI failed to submit the second quarterly progress report for 2017, as required by Order for Compliance Item No. Four (4) of Order No. 7802.

As a result of the aforementioned violations, NOV No. W17-54-072-GMP and W17-54-073-GMP were issued to IEI.

11. On August 2, 2017, in accordance with Order for Compliance Item No. Ten (10) of Order No. 7802, WVDEP requested payment of the entire amount of the penalty held in abeyance due to IEI's failure to properly submit April, May, and June 2017 DMRs.
12. On August 30, 2017, WVDEP personnel conducted a records review of IEI. During this review, the following violations of the WV/NPDES permit and WV State Code were observed and documented:
 - a. 22-11-1 et seq, Appendix A.III.2, and Section C.06 - IEI failed to properly submit the April, May, and June 2017 DMRs, as required by Order for Compliance Item No. Ten (10) of Order No. 7802. The DMRs were not submitted until August 8, 2017, and they contained numerous incorrect values. In addition, July 2017 DMRs also contained numerous incorrect values (Tables 3 and 4).

As a result of the aforementioned violation, NOV No. W17-54-074-GMP was issued to IEI.

13. On October 21, 2017, WVDEP personnel conducted a record review and determined that the WV/NPDES permit modification to add Plant No. Two (2) to the existing WV/NPDES permit for Plant No. One (1) had not been issued. IEI resubmitted the WV/NPDES permit modification application on September 11, 2017, in response to corrections previously requested by WVDEP Permitting Section. However, the application remained administratively incomplete.
14. On October 21, 2017, WVDEP was made aware through the Spill Notification Line of a large industrial fire occurring at Plant No. One (1). The fire started at approximately 12:30 am and quickly engulfed the building. WVDEP personnel arrived at the scene at 10:00 am and began cooperating with incident command.

ORDER FOR COMPLIANCE

And now, this day of October 26, 2017, IEI is hereby ORDERED by the Director as follows:

1. IEI shall immediately take measures to initiate compliance with all terms and conditions of its WV/NPDES permit and pertinent laws and rules.
2. IEI shall immediately provide a detailed inventory of all materials that were burned at Plant No. One (1).
3. Within thirty (30) days of the effective date of this Order, IEI shall electronically submit any remaining information requested by WVDEP Permitting Section which is necessary for issuance of the WV/NPDES permit modification to incorporate regulated activity at Plant No. Two (2). Any questions regarding the application process shall be directed to WVDEP DWWM-Permitting Section at (304) 926-0495.

4. Within ten (10) days of the effective date of this Order, IEI shall submit for approval a proposed plan of corrective action and schedule, outlining action items and completion dates for how and when IEI will achieve compliance with all terms and conditions of its WV/NPDES permit and pertinent laws and rules. The POCA shall include, but not be limited to, the following:
 - a. Provisions for providing proof of proper disposal, in the form of receipts, of the burned material at Plant No. One (1).
 - b. Provisions for providing detailed inventories of all materials at all other sites in West Virginia that that are owned by companies associated with IEI and/or Dr. Saurabh Naik.

The plan of corrective action shall make reference to WV/NPDES Permit No. WV0003204 and Order No. 8779. The plan of corrective action shall be submitted to:

Chief Inspector
Environmental Enforcement - Mail Code #031328
WVDEP
601 57th Street SE
Charleston, WV 25304

Upon approval, the plan of corrective action and schedule shall be incorporated into and become part of this Order, as if fully set forth herein. Failure to submit an approvable plan of corrective action and schedule or failure to adhere to the approved schedule is a violation of this Order.

5. Within thirty (30) days of the effective date of this Order, in accordance with Order for Compliance Item No. Ten (10) of Order No. 7802, IEI shall pay the entire amount of the penalty held in abeyance, as requested in WVDEP's aforementioned August 2, 2017 correspondence. Payment, in the amount of sixty thousand six hundred twenty-two dollars and fifty cents (\$60,622.50) shall include a reference to Order No. 7802 and shall be mailed to:

Chief Inspector
Environmental Enforcement - Mail Code #031328
WVDEP
601 57th Street SE
Charleston, WV 25304

OTHER PROVISIONS


1. Compliance with the terms and conditions of this Order shall not in any way be construed as relieving IEI of the obligation to comply with any applicable law, permit, other order, or any other requirement otherwise applicable. Violations of the terms and conditions of this Order may subject IEI to additional enforcement action in accordance with the applicable law.

2. The provisions of this Order are severable and should a court or board of competent jurisdiction declare any provisions to be invalid or unenforceable, all other provisions shall remain in full force and effect.
3. This Order is binding on IEI, its successors and assigns.
4. This Order shall terminate upon IEI's notification of full compliance with the "Order for Compliance" and verification of this notification by WVDEP.

RIGHT OF APPEAL

Notice is hereby given of your right to appeal the terms and conditions of this Order which you are aggrieved to the Environmental Quality Board by filing a NOTICE of APPEAL on the form prescribed by such Board, in accordance with the provisions of Chapter 22, Article 11, Section 21 of the Code of West Virginia within thirty (30) days after receipt of this Order.

This Order shall become effective upon receipt.



Scott G. Mandirola, Director
Division of Water and Waste Management

Table One: Outlet 001 DMR Exceedance Summary

Outlet 001 DMR Exceedances - AVG. MONTHLY - June/2015 through May/2017						Degree of non-compliance		
Date	Parameter	Units	Permitted avg. monthly	Reported avg. monthly	% Exceedance	Min	Mod	Maj
Dec. 2015	Tot. Rec. Aluminum	mg/l	0.37	0.663	79%	-	X	-
July 2016	Tot. Recov. Iron	mg/l	1.5	1.54	3%	X	-	-
Sept. 2016	Tot. Recov. Iron	mg/l	1.5	4.8	220%	-	X	-
Sept. 2016	Tot. Recov. Aluminum	mg/l	0.37	1.44	289%	-	X	-

Outlet 001 DMR Exceedances - MAX. DAILY - June/2015 through May/2017						Degree of non-compliance		
Date	Parameter	Units	Permitted max. daily	Reported max. daily		Min	Mod	Maj
Sept. 2016	Tot. Recov. Iron	mg/l	2.2	4.8		X	-	-
Sept. 2016	Tot. Recov. Aluminum	mg/l	0.75	1.44		X	-	-

Outlet 001 Totals		Degree of non-compliance		
		Min	Mod	Maj
		3	3	0

Table Two: Outlet 004 DMR Exceedance Summary

Outlet 004 DMR Exceedances - AVG. MONTHLY - June/2015 through May/2017						Degree of non-compliance		
Date	Parameter	Units	Permitted avg. monthly	Reported avg. monthly	% Exceedance	Min	Mod	Maj
Aug. 2015	Tot. Rec. Iron	mg/l	1.2	2.41	101%	-	X	-
Sept. 2015	Tot. Rec. Iron	mg/l	1.2	8.86	638%	-	-	X
Oct. 2015	Tot. Rec. Iron	mg/l	1.2	3.11	159%	-	X	-
Dec. 2015	Tot. Rec. Iron	mg/l	1.2	5.82	385%	-	-	X
June 2016	Tot. Recov. Iron	mg/l	1.2	1.22	2%	X	-	-
July 2016	Tot. Recov. Iron	mg/l	1.2	2.35	96%	-	X	-
Sept. 2016	Tot. Recov. Iron	mg/l	1.2	1.28	7%	X	-	-
Oct. 2016	Tot. Recov. Iron	mg/l	1.2	2.95	146%	-	X	-
Dec. 2016	Tot. Recov. Iron	mg/l	1.2	1.23	3%	X	-	-
Jan. 2017	Tot. Recov. Iron	mg/l	1.2	1.59	33%	X	-	-

Outlet 004 DMR Exceedances - MAX. DAILY - June/2015 through May/2017						Degree of non-compliance		
Date	Parameter	Units	Permitted max. daily	Reported max. daily	% Exceedance	Min	Mod	Maj
Aug. 2015	Tot. Rec. Iron	mg/l	2.2	2.41	10%	X	-	-
Sept. 2015	Tot. Rec. Iron	mg/l	2.2	8.86	303%	-	X	-
Oct. 2015	Tot. Rec. Iron	mg/l	2.2	3.11	41%	X	-	-
Dec. 2015	Tot. Rec. Iron	mg/l	2.2	5.82	165%	-	X	-
July 2016	Tot. Recov. Iron	mg/l	2.2	2.35	7%	X	-	-
Oct. 2016	Tot. Recov. Iron	mg/l	2.2	2.95	34%	X	-	-

Outlet 004 DMR Exceedances - pH MAX. DAILY (Min.) - June/2015 through May/2017						Degree of non-compliance		
Date	Parameter	Units	Permitted min. daily	Reported min. daily	% Exceedance	Min	Mod	Maj
Oct. 2015	pH	S.U.	6	2.4	480.0%		X	
Nov. 2015	pH	S.U.	6	2.3	493.3%		X	
Jan. 2016	pH	S.U.	6	5	133.3%		X	

Outlet 004 Totals						Degree of non-compliance		
						Min	Mod	Maj
						8	9	2

Table 3: IEI Outlet 001 Incorrect DMR Values

Month	Parameter	Concentration	Units	Correct Value	Reported Value
April	pH	Inst. Min.	S.U	8.1	6
April	Iron	Avg. Mon.	mg/l	0.107	1.5
April	Aluminum	Avg. Mon.	mg/l	0.031	0.37
April	Aluminum	Max. Daily	mg/l	0.031	0.31
April	Phthalate Esters	Avg. Mon.	µg/l	<0.024 (MDL)	2.5
April	Phthalate Esters	Max. Daily	µg/l	<0.024 (MDL)	4.9
May	pH	Inst. Min.	S.U	7.3	6
May	Iron	Avg. Mon.	mg/l	0.224	1.5
May	Aluminum	Avg. Mon.	mg/l	0.049	0.37
May	Phthalate Esters	Avg. Mon.	µg/l	0.0075	2.5
June	pH	Inst. Min.	S.U	7.7	6
June	PH	Inst. Max.	S.U	7.7	8.1
June	Iron	Avg. Mon.	mg/l	0.298	1.5
June	Iron	Max. Daily	mg/l	0.298	0.107
June	Phthalate Esters	Avg. Mon.	µg/l	0.0072	2.5
June	Phthalate Esters	Max. Daily	µg/l	0.0072	2.5
June	Oil & Grease	Avg. Mon.	mg/l	<4.9	<5.0
June	Oil & Grease	Max Daily	mg/l	<4.9	4.9
July	pH	Inst. Min.	S.U.	7.3	6
July	Aluminum	Max. Daily	mg/l	0.024	0.75
July	Iron	Max. Daily	mg/l	0.227	2.2
July	Phthalate Esters	Max. Daily	µg/l	0.0025	4.9

Table 4: IEI Outlet 004 Incorrect DMR Values

Month	Parameter	Concentration	Units	Correct Value	Reported Value
April	pH	Inst. Min.	S.U.	7.7	6
April	Iron	Avg. Mon.	mg/l	0.6	1.2
April	Lead	Avg. Mon.	mg/l	<0.01	2.6
April	Lead	Max. Daily	mg/l	<0.01	0.01
April	1,1 Dichloroethylene	Avg. Mon.	µg/l	<0.50	<0.01
April	1,1 Dichloroethylene	Avg. Mon.	µg/l	<0.50	0.5
April	1,2 Dichloroethene	Avg. Mon.	µg/l	<0.50	<0.01
April	1,2 Dichloroethene	Max. Daily	µg/l	<0.50	0.5
April	Vinyl Chloride	Avg. Mon.	µg/l	1.66	>0.01
April	Trichloroethylene	Avg. Mon.	µg/l	0.65	>0.01
May	pH	Inst. Min.	S.U.	7.3	6
May	Iron	Avg. Mon.	mg/l	0.617	1.2
May	Lead	Avg. Mon.	mg/l	<0.01	2.6
May	Lead	Max. Daily	mg/l	<0.01	0.01
May	1,1 Dichloroethylene	Avg. Mon.	µg/l	<0.5	>0.1
May	1,1 Dichloroethylene	Max. Daily	µg/l	<0.5	0.5
May	1,2 Dichloroethene	Avg. Mon.	µg/l	<0.5	>0.1
May	1,2 Dichloroethene	Max. Daily	µg/l	<0.5	0.5
May	Vinyl Chloride	Avg. Mon.	µg/l	<0.5	>0.1
May	Vinyl Chloride	Max. Daily	µg/l	<0.5	0.5
May	Trichloroethylene	Avg. Mon.	µg/l	<0.5	>0.1
May	Trichloroethylene	Max. Daily	µg/l	<0.5	0.5
June	pH	Inst. Min.	S.U.	7.4	6
June	Iron	Avg. Mon.	mg/l	1.39	1.2
June	Lead	Avg. Mon.	mg/l	0.019	2.6
June	1,1 Dichloroethylene	Avg. Mon.	µg/l	<0.5	>0.1
June	1,1 Dichloroethylene	Max. Daily	µg/l	<0.5	0.5
June	1,2 Dichloroethene	Avg. Mon.	µg/l	<0.5	>0.1
June	1,2 Dichloroethene	Max. Daily	µg/l	<0.5	0.5
June	Vinyl Chloride	Avg. Mon.	µg/l	<0.5	2
June	Vinyl Chloride	Max. Daily	µg/l	<0.5	0.5
June	Trichloroethylene	Avg. Mon.	µg/l	<0.5	2.7
June	Trichloroethylene	Max. Daily	µg/l	<0.5	0.5
June	TSS	Avg. Mon.	mg/l	4	1
June	Oil & Grease	Avg. Mon.	mg/l	<4.9	>0.1
June	Oil & Grease	Max Daily	mg/l	<4.9	4.9
July	pH	Inst. Min.	S.U.	7.7	6
July	Iron	Max. Daily	mg/l	2.22	2.2
July	Lead	Max. Daily	mg/l	0.021	5.2
July	1,1 Dichloroethylene	Avg. Mon.	µg/l	<0.5	0.5
July	1,1 Dichloroethylene	Max. Daily	µg/l	<0.5	0.5
July	1,2 Dichloroethene	Avg. Mon.	µg/l	<0.5	0.5
July	1,2 Dichloroethene	Max. Daily	µg/l	<0.5	0.5
July	Vinyl Chloride	Max. Daily	µg/l	1.8	2.9
July	Trichloroethylene	Avg. Mon.	µg/l	<0.5	0.5
July	Trichloroethylene	Max. Daily	µg/l	<0.5	3.9

IEI Plant No.1 (WV0003204) – 6/9/16



Underflow not functional at Outfall 004



Outlet 001 with plastic pellets



Poor housekeeping



Poor housekeeping and outdoor drum storage



Outdoor storage of airbag material



Outdoor drum storage



Leaking drum



Outdoor plastic storage



Outdoor plastic storage



Outdoor plastic storage



1st unpermitted Outfall



2nd unpermitted Outfall



Outdoor storage



Leaking transformers



Some remaining waste



Old diesel spill -Cleanup not complete



Plastic pellets escaping the building and loading area



Wood waste



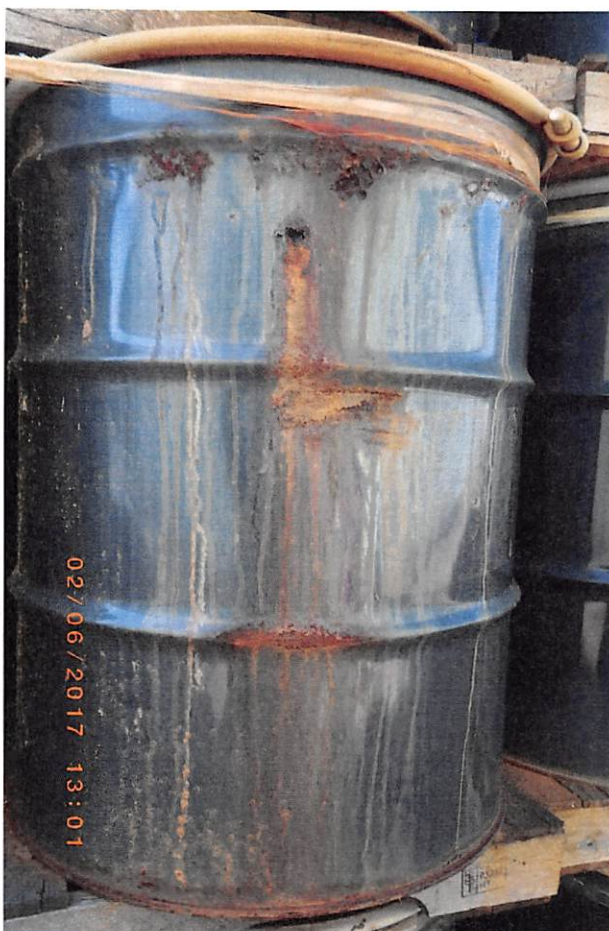
Plastic totes containing Butacite



Butacite in outdoor storage totes



Outside storage of drums



Drums deteriorating outdoors



Spill noted at prior inspection not remediated



Supersacks stored outside



Outdoor plexiglass storage



First unpermitted Outlet



Second Unpermitted Outlet



Runoff from yard storage – Third unpermitted outlet